

Exhibit 1

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF STEVEN S.
SCHULTE IN SUPPORT OF
NACHAWATI PLAINTIFFS' RESPONSE
TO DEFENDANTS' MOTION FOR
ENTRY OF (1) AN ORDER TO SHOW
CAUSE WHY PLAINTIFFS WHO HAVE
SUBMITTED NON-BONA FIDE
RECEIPTS SHOULD NOT BE
DISMISSED WITH PREJUDICE AND (2)
A CASE MANAGEMENT ORDER
ADDRESSING CERTAIN PLAINTIFFS
WHO HAVE NOT SUBMITTED
RECEIPTS**

This Document Relates to:

Doe (LR) v. Uber Technologies, Inc., et al.,
No. 3:24-cv-04306-CRB

DOE (KH) v. Uber Technologies, Inc., et al.,
No. 3:24-cv-04326-CRB

Doe (YE) v. Uber Technologies, Inc., et al.,
No. 3:24-cv-04330-CRB

Doe (TW) v. Uber Technologies, Inc., et al.,
No. 3:24-cv-04356-CRB

Doe (E.N.) v. Uber Technologies, Inc., et al.,
No. 3:24-cv-04370-CRB

Doe (EB) v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05110-CRB

Doe (D.G.) v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05169-CRB

Date: September 19, 2025

Time: 10:00 a.m.

Courtroom: 6 – 17th Floor

1 *Doe (CH) v. Uber Technologies, Inc., et al.,*
2 No. 3:24-cv-05340-CRB

3 *DOE (JH) v. Uber Technologies, Inc., et al.,*
4 No. 3:24-cv-05341-CRB

5 *Doe (TM) v. Uber Technologies, Inc., et al.,*
6 No. 3:24-cv-05764-CRB

7 *Doe (K.M.) v. Uber Technologies, Inc., et al.,*
8 No. 3:24-cv-05796-CRB

9 *Doe (EP) v. Uber Technologies, Inc., et al.,*
10 No. 3:24-cv-05946-CRB

11 *Doe (AR) v. Uber Technologies, Inc., et al.,*
12 No. 3:24-cv-05947-CRB

13 *Doe (CS) v. Uber Technologies, Inc., et al.,*
14 No. 3:24-cv-05964-CRB

15 *Doe (E.W.) v. Uber Technologies, Inc., et al.,*
16 No. 3:24-cv-06073-CRB

17 *Doe (JS) v. Uber Technologies, Inc., et al.,*
18 No. 3:24-cv-06075-CRB

19 *DOE (SS) v. Uber Technologies, Inc., et al.,*
20 No. 3:24-cv-06076-CRB

21 *Doe NLG (NC) v. Uber Technologies, Inc., et al.,*
22 No. 3:25-cv-00069-CRB

23 *Doe NLG (BH) v. Uber Technologies, Inc., et al.,*
24 No. 3:25-cv-00369-CRB

25 *Doe NLG (AB) v. Uber Technologies, Inc., et al.,*
26 No. 3:25-cv-01079-CRB

27 *Doe NLG (JV) v. Uber Technologies, Inc., et al.,*
28 No. 3:24-cv-08622-CRB

DECLARATION OF STEVEN S. SCHULTE

I, Steven S. Schulte, declare pursuant to 28 U.S.C. § 1746:

1. I am a partner at the law firm of Nachawati Law Group, representing several plaintiffs, including the above referenced plaintiffs, in MDL 3084. I am a member in good standing of the State Bar of Texas. I make this declaration based upon matters within my own personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

2. This declaration is made in support of the Nachawati Plaintiffs' Response to Defendants' Motion for Entry of Two Orders Related to Receipts (ECF No. 3604).

3. I participated in a meet and confer session with Uber counsel on July 30, 2025 via a Zoom session scheduled for 10:30 am – 11:00 am Central.

4. Attached as **Exhibit 1-A** is a true and correct copy of a series of e-mail communication between me, other Plaintiffs' counsel, and Uber counsel, including the e-mail containing Zoom information.

5. During the Zoom meet and confer, I stated to Uber counsel that I want to reach a resolution and avoid judicial intervention, and I repeatedly requested a reasonable time to investigate allegations contained in Uber's meet and confer letter. Liaison counsel Roopal Luhana attended the meet and confer as well, and she also made a similar request.

6. Uber counsel never directly responded to my requests or Ms. Luhana's, not even to state a willingness to consider the request, stating only that they would like to get the Motions on file.

7. After the meet and confer, at 1:57 pm Central time on the same day, July 30, 2025, I received an e-mail from Uber counsel, addressed to all Plaintiffs' counsel and Ms. Luhana. **Exhibit 1-A**, p. 3. The e-mail contains this statement: "As I mentioned on various calls, to the extent that you determine you will dismiss a matter implicated by Uber's letter and the issues discussed on our Zooms, please let us know as we will update the Court and remove the names from our proposed orders and briefing." *Id.*

8. I then received a reply-all response sent by Ms. Luhana, reiterating the request for "opportunity to discuss the feedback [Uber counsel] provided with our clients and circle back with

1 you.” **Exhibit 1-A**, p. 2. The request was for Uber to “file the motion until the end of this week to
2 allow us an opportunity to further discuss.” *Id.* As July 30 is a Wednesday, this means the request
3 was for two days.

4 9. I then received another reply-all response from another Plaintiffs’ counsel seconding
5 Ms. Luhana’s request. **Exhibit 1-A**, p. 1.

6 10. Again, Uber did not directly respond to these requests. Instead, approximately 2.5
7 hours later, at 4:02 pm Central time, I received notification of filing from the Court’s ECF system
8 that Uber had filed the Motions subject to the meet and confer.

9 11. Attached as **Exhibit 1-B** is a true and correct copy of the Uber Ride Information Form
10 for Plaintiff ID 1491, with identifying information redacted, attached as an exemplar.

11 12. Attached as **Exhibit 1-C** is a true and correct copy of the Uber Ride Information Form
12 for Plaintiff ID 1511, with identifying information redacted, attached as another exemplar.

13 I declare under penalty of perjury that the foregoing is true and correct.

14 Executed on August 27, 2025 in Dallas, Texas.

15 **NACHAWATI LAW GROUP**

16 /s/ Steven S. Schulte

17 Steve Schulte (TX SBN 24051306)